

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NO.: 1:21-cr-226
)	
Plaintiff,)	
)	JUDGE PAMELA A. BARKER
vs.)	
)	
)	
DAVIS LU,)	
)	
Defendant.)	

**DEFENDANT'S NOTICE OF EXPERT TESTIMONY PURSUANT TO FEDERAL
RULE OF EVIDENCE 702**

Now comes the Defendant, by and through undersigned counsel, Friedman, Nemecek & Long, L.L.C., and hereby gives Notice pursuant to Federal Rule of Evidence 702 and Criminal Rule 16 of its intent to offer the testimony of Warner Scheyer as an expert witness on behalf of the defense. The defense hereby provides the following Notice and Disclosures as pertinent to the above-referenced witness:

1. Complete Statement of All Opinions: Witness opinion/findings are set forth in the Report provided to the Government. The defense is aware of its obligations under Federal Rule of Criminal Procedure 16(B)(1)(C).

2. Bases or Reasons for Opinions: Bases for witness opinions/findings are set forth in the Report provided to the Government.

3. Qualifications: Qualifications are set forth in the Report and curriculum vitae provided to the Government.

4. Publications Authored in Previous Ten Years: None.

5. List of Cases Within the Last Four Years Witness has Testified as an Expert at Trial or

by Deposition: Any cases where the witness has testified and/or been deposed within the previous four (4) years are identified within the Report and/or curriculum vitae, which have been provided to the Government.

Pursuant to Federal Rule of Criminal Procedure 16(B)(1)(C)(iv), the Defendant expressly reserves the right to supplement the foregoing information and/or disclosures.

Respectfully submitted,

Dated: May 7, 2024

/s/ Eric C. Nemecek

Eric C. Nemecek (0083195)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice was filed by CM/ECF on the 7th day of May, 2024, which will send a notification of such filing electronically to the following: Brian Deckert, Assistant United States Attorney, 801 Superior Avenue, Cleveland, OH 44113.

Respectfully submitted,

/s/ Eric C. Nemecek

ERIC C. NEMECEK

IAN N. FRIEDMAN

Counsel for Defendant